



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
**75 Hawthorne Street**  
**San Francisco, California 94105**

DRAFT 5-31-2019

Laura Duchnak, Director  
Base Realignment and Closure Program Management Office  
U.S. Department of Navy  
33000 Nixie Way, Bldg 50 Suite 207  
San Diego CA 92147

Dear Ms. Duchnak:

Thank you for your letter on May 22, 2019, concerning the Navy's request for EPA review on the Parcel G Work Plan for the Hunters Point Naval Shipyard Superfund site. On May 24, 2019, EPA provided comments on the Navy's Responses to Comments (RTCs) sent on May 13, 2019.

In December, EPA began sending comments on the draft Parcel G Work Plan, requesting technical details that would typically be provided in this type of work plan. We appreciate the Navy provided additional information in the RTCs to EPA comments; however, some of the technical details we requested were still missing from your responses. For example, in the RTCs, the Navy only partially addressed comments about statistical methodology and data evaluation related to the soil reference background testing.

We understand how critical it is to begin the soil reference background testing in a timeframe that will support the radiological rework on Parcel G prior to the 2020 rainy season. Once we receive the previously requested technical details along with change pages, we can consider a partial Work Plan approval for the background testing field work to begin. This is the path we outlined in our April 11, 2019, letter and our discussion in our meeting on April 15, 2019. At this time, we are waiting for the Navy to address our comments we previously provided.

Sincerely,

Enrique Manzanilla  
Director, Superfund Division

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cc: Grant Cope, California Environmental Protection Agency and  
California Department of Toxic Substances Control  
Anthony Chu, California Department of Public Health  
Dr. Grant Colfax, San Francisco Department of Public Health  
Nadia Sesay, San Francisco Office of Community Investment and Infrastructure  
Terry Seward, Regional Water Quality Control Board